## REMARKS

Status of Claims

Claims 1-22 are pending in the present application and are resubmitted for reconsideration. The independent claims of this application are claims 1, 12, 15, 16, 18, 21 and 22.

Rejections under 35 USC § 103

Claims 1-11 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Gwon (US Pub. 2003/0104814 A1), hereinafter "Gwon," in view of Leung (US Patent No. 6,501,746), hereinafter "Leung.'

Claims 12, 15, 16, 18, and 21-22 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Eyuboglu et al. (US Pub. 2002/0196749 A1), hereinafter "Eyuboglu", in view of Leung.

Claims 13 and 14 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Eyuboglu and Leung as applied to claim 12, and further in view of Ray et al. (US Pub. 2003/0135626 A1), hereinafter "Ray."

Claims 17 and 19-20 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Eyuboglu and Leung as applied to claims 16 and 18, and further in view of Kato et al. (US Pub. 2002/0078226 A1), hereinafter "Kato."

Applicants respectfully traverse the rejections. To establish a *prima facie* case of obviousness, three basic criteria must be met.

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success.

Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143-§2143.03 for decisions pertinent to each of these criteria.

Applicants submit that the cited references, either taken separately or in combination, do not disclose, teach or suggest all the subject matter recited in independent claims 1, 12, 15, 16, 18, 21 and 22, or *a fortiori* in any of their dependent claims.

As correctly conceded by the Office Action, neither Gwon nor Eyugoblu disclose, teach or suggest "an element comprising the storage location **assigns the location of session information as an access terminal identifier**" as recited in, e.g., independent claim 1. The Office Action relies upon another reference, Leung, for this subject matter. However, and contrary to the Examiner's assertion, what Leung only shows at Col. 5:7-15 is:

> "storing at least a portion of the mobile node ID in the registration request. Once an IP address is assigned to the mobile node, the IP address may then be transferred to the mobile node in a registration reply composed by the Home Agent. The mobile node ID, or portion thereof, may be similarly transferred in the registration reply to permit a Foreign Agent and the mobile node to map the mobile node ID to the assigned IP address. The mobile node may then use the IP address in subsequent communications with a corresponding node. The IP address may later be de-allocated for use by another mobile node."

Leung is directed to methods for assigning an IP address to a mobile node during registration. After registration a table is updated with a mapping of the mobile node ID to the IP address. However, there is no mention in Leung of assigning the location of session information **as an access terminal identifier**. In Leung, both the access terminal ID and the assigned IP address are used in conjunction, and the IP address is not used *in lieu of* the access terminal ID, and therefore is not "assigned *as* an access terminal identifier". Thus, Leung does not disclose, teach or suggest the subject matter that is missing in either Gwon or Eyuboglu.

Therefore, Applicants submit that combining the teachings of either Gwon or Eyuboglu with the teachings of Leung would not yield the subject matter recited in independent claims 1, 12, 15, 16, 18, 21 and 22 of the present application.

Applicants therefore submit that independent claims 1, 12, 15, 16, 18, 21 and 22 are patentable over Gwon in view of Leung and are also patentable over Eyugoblu in view of Leung. Accordingly, reconsideration and withdrawal of their rejections is respectfully requested.

It is submitted that claims 2-11 are also allowable because they depend from claim 1, which is allowable over the cited art references based upon the above arguments, as well as for the patentable subject matter recited in claims 2-11. Accordingly, reconsideration and withdrawal of their rejections is respectfully requested.

It is submitted that claims 13 and 14 are also allowable because they depend from claim 12, which is allowable over the cited art references based upon the above arguments, as well as for the patentable subject matter recited in claims 13 and 14. Accordingly, reconsideration and withdrawal of their rejections is respectfully requested.

It is submitted that claim 17 is also allowable because it depends from claim 16, which is allowable over the cited art references based upon the above arguments, as well as for the patentable subject matter recited in claim 17. Accordingly, reconsideration and withdrawal of its rejection is respectfully requested.

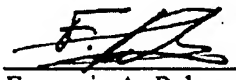
It is submitted that claims 19 and 20 are also allowable because they depend from claim 18, which is allowable over the cited art references based upon the above arguments, as well as for the patentable subject matter recited in claims 19 and 20. Accordingly, reconsideration and withdrawal of their rejections is respectfully requested.

## REQUEST FOR ALLOWANCE

In view of the foregoing, Applicants submit that all pending claims in the application are patentable. Accordingly, reconsideration and allowance of this application are earnestly solicited. Should any issues remain unresolved, the Examiner is encouraged to telephone the undersigned at the number provided below.

Respectfully submitted,

Dated: February 19, 2009

By: 

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